

Response Deadline: October 14, 2011 at 4:00 p.m. (Eastern Time)
Hearing Date and Time: October 27, 2011 at 10:00 a.m. (Eastern Time)

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
:
LEHMAN BROTHERS HOLDINGS, INC., *et al.* : Case No. 08-13555 (JMP)
:
Debtors. : (Jointly Administered)
:
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CORRECTED NOTICE OF MOTION OF INTERNATIONAL BANK FOR
RECONSTRUCTION AND DEVELOPMENT PURSUANT TO RULE
3018(a) OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE
FOR TEMPORARY ALLOWANCE OF CLAIMS FOR VOTING
PURPOSES

PLEASE TAKE NOTICE that upon the Motion of International Bank for Reconstruction and Development (the “**Moving Party**”) for entry of an order, pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure, temporarily allowing the IBRD Claims for the purpose of voting to accept or reject the Plan, dated October 5, 2011 (the “**Motion**”) [Docket No. 20591],¹ the

¹ Capitalized terms used and not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Moving Party shall move this Court for an order temporarily allowing the IBRD
Claims solely for the purpose of voting to accept or reject the Plan.

PLEASE TAKE FURTHER NOTICE that any responses to the Motion
must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure
and the Local Rules of the Bankruptcy Court, and shall be filed and served in
accordance with the *Second Amended Order Pursuant to Section 105(a) of the
Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain
Notice and Case Management Procedures*, in each case so as to be received by
the Notice Parties (with a copy to the chambers of the Honorable James M. Peck,
United States Bankruptcy Judge, One Bowling Green, New York, New York
10004, Courtroom 601) no later than October 14, 2011 at 4:00 p.m.

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Motion, the relief requested in the Motion may be granted without a hearing.

Dated: New York, New York
October 7, 2011

Davis Polk & Wardwell LLP

By: s/ James I. McClammy
Dennis E. Glazer
James I. McClammy

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